

---



# Compliance Manual

## for Indiana's

## Vehicle Maintenance Shops

---



### PART ONE

## Mechanical Repair

(PART TWO - Collision Repair/Automotive Refinishing is under development)

#### *Featuring...*

- ✓ IDEM rules and regulations
- ✓ DOT and OSHA rules and regulations
- ✓ Fire & Building Services' information
- ✓ Waste prevention & minimization recommendations

*Published by the*

**INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT**

Compliance and Technical Assistance Program

June 2002

# ACKNOWLEDGEMENTS

This manual was written and developed by staff in IDEM's Compliance and Technical Assistance Program: Cheri Storms, Mark Stoddard, and Paula Smith. Former CTAP employees, Joyce Vallance and Dave Lawrence also contributed greatly to the development of this manual.

Special thanks to staff throughout IDEM for their comments and advice, especially: Dave Berrey, Jim Hunt, John Crawford, Lee Parsons, Anne Remek, Mike Pennington, Rosemary Cantwell, Scott Draschil, Lynn Newlon, Robin Feller, Cyndi Wagner, Mark Amick, Jon Bates, and Warren Greiling.

A group of reviewers provided information and suggestions to improve the manual. IDEM appreciates the input received from the following external reviewers:

Jerry Hebert, Randy Frey, Tony Kurtz - Indiana Department of Labor, Bureau of Safety & Education Training (BuSET)

Mara Snyder, Tim Callas - Indiana Department of Fire & Building Services

Don Arnold - Indiana Department of Transportation

Nancy Reagan - Automotive Service Professionals of Indiana

Don Seader - World Wide Automotive

Tom Frantz, Dave Ehrhard, Mike Callahan - Safety-Kleen

Joel Haul - Heritage Environmental Services

Barry McConnell - Shell Oil Company

Randy Powell - Parts Guild Association

Deborah Steinkamp - Spencer County Solid Waste Management District

Mike Baker- Quality Mill Supply Co., Inc.

Mike Pitts - Indiana Petroleum Marketers & Convenience Store Association

This manual contains material from the following sources and is reprinted with permission.

U.S. Department of Labor's Office of Training and Education

Lab Safety Supply, Inc.

Labelmaster

General Motors Corporation

*Printed on 30% post-consumer content recycled paper*

If you have any questions or comments, or wish to obtain additional copies of this manual, contact the:

Indiana Department of Environmental Management  
Compliance and Technical Assistance Program  
150 West Market Street Suite 703  
Indianapolis, IN 46204-2811

317/232-8172 or toll-free at 800/988-7901.

Also see Sections 1.7 and 1.8 of this manual for the names and phone numbers of other IDEM offices and other agencies.

## NOTICE

### Photocopying this Manual

This material may be used, in whole or in part, without permission. As such, it may not be copyrighted in any form. When copying, please include this NOTICE and acknowledge IDEM as the source of the material.

### Affirmative Action & IDEM

IDEM is an equal opportunity and affirmative action employer. IDEM ensures that the benefits of its state assisted programs are available to all eligible persons regardless of race, color, national origin, handicap, age, or veteran status.

### Disclaimer

This manual, *Compliance Manual for Indiana's Vehicle Maintenance Shops*, was published by the Indiana Department of Environmental Management (IDEM). Neither the publisher of the manual nor

any persons acting on its behalf:

- a) make any warranty or representation, expressed or implied, with respect to the use of any information contained in this document, or that the use of any information, apparatus, method, or process disclosed in this document may not infringe on privately owned rights; or
- b) assume any liabilities with respect to the use of, or damages resulting from the use of any information, apparatus, method, or process disclosed in this document.

The material offered in this manual is not intended to be a recommendation of any particular technique or method. Rather, this manual is offered for educational and informational purposes and is advisory only. Compliance with applicable regulations is the responsibility of each individual business. When using this manual and making any decision concerning regulatory compliance or chemical management, it is highly recommended that the particular facts and circumstances be reviewed by appropriately trained professionals.

References to specific brand names or products in this manual are used as examples only, and IDEM makes no warranties or representations about the effectiveness of such products. Nothing in this manual should be construed as an endorsement by IDEM of any particular brand or product.

Indiana Environmental Rules and Statutes books may be ordered from IDEM by visiting IDEM's web site, or by calling 317/233-1044 or toll free 800/451-6027 press 0 and request ext. 3-1044. An order form for Indiana's OSHA regulations is available at the Indiana Department of Labor's web site. To obtain the Indiana Department of Fire & Building Services' regulations, call their Book Store at 317/232-6173.

## **Liability**

The information compiled in this manual is being provided by IDEM as general guidance to the vehicle maintenance community. Although every effort has been made to ensure the accuracy and completeness of this information, the authors and reviewers of this publication cannot guarantee that it is completely free of errors or omissions. It is the responsibility of the owners and operators of each facility to ensure that the facility complies with all applicable regulations. The rules and regulatory interpretations may change without individual notice to vehicle maintenance shops.

# CONTENTS

## CHAPTER 1—INTRODUCTION

1.1	Vehicle Maintenance & the Environment .....	1
1.2	IDEM's Approach to Environmental Protection .....	1
1.3	Who Should Use this Manual? Our Typical Vehicle Maintenance Shop .....	2-5
1.4	The Benefits of Using This Manual .....	3
1.5	How to Use this Manual.....	6
1.6	Whom to Call for Assistance .....	7
1.7	Other Sources of Information.....	9

## CHAPTER 2—DETERMINING WHICH REGULATIONS APPLY TO YOUR SHOP

2.1	Classifying for Occupational Health and Safety Administration (OSHA) Regulations ....	11
2.2	Classifying for Indiana Department of Fire & Building Services Regulations .....	14
2.3	Classifying for Department of Transportation (DOT) Regulations .....	14
2.4	Determining Applicable Water Regulations .....	15
	Wastewater .....	15
	Wellhead Protection Areas .....	15
2.5	Determining Applicable Air Regulations .....	15
	Motor Vehicle Air Conditioning (MVAC) Service .....	15
	Chlorinated Solvents (for Parts Washing).....	16
	Solvents used by Shops in Lake, Porter, Clark & Floyd Counties .....	17
	Automotive Refinishing .....	18
	Fugitive Dust from Unpaved Parking Lots .....	18
	Catalytic Converters .....	18
2.6	Classifying Your Shop to Determine Its Hazardous Waste Generator Status .....	19
A.	Is Your Shop a CESQG, SQG or LQG? .....	19
	Table 2-A: Determining Your Generator Status .....	19
	Table 2-B: CESQG vs. SQG Basic Requirements - Comparison Chart .....	20
B.	What is Hazardous Waste?.....	21
	Table 2-C: Summary of Hazardous Wastes Generated by a Typical Shop.....	23
C.	Changing Your Hazardous Waste Classification .....	27
D.	EPA Identification Number.....	27
E.	CESQGs and Hazardous Waste Management.....	27

## CHAPTER 3—MANAGEMENT REQUIREMENTS FOR HAZARDOUS MATERIALS AND HAZARDOUS WASTES

3.1	Hazardous Materials vs. Hazardous Wastes .....	31
3.2	Purchasing and Receiving Products That Contain Hazardous Materials.....	31
3.3	Storing Hazardous Materials .....	33
3.4	Storing Hazardous Wastes .....	34
3.5	Proper Handling and Shipping of Your Hazardous Wastes .....	36
3.6	Liability and Choosing an Environmental Services Company .....	39
3.7	Spill Prevention & Preparedness .....	40
3.8	In Case of a Spill.....	40

3.9 What if You Have a Violation? Who's Liable? .....	43
---	----

## **CHAPTER 4—COMPLIANCE REQUIREMENTS**

**(Including tips on how to prevent or minimize waste and how to enhance worker safety)**

### **PRODUCTS / WASTES**

Contents.....	45
Aerosol Containers.....	47
Antifreeze .....	49
Batteries (Lead Acid) .....	55
Brake & Clutch Repair.....	59
Catalytic Converters (and Emission Control Devices).....	65
Fluorescent Light Tubes & High Intensity Discharge Lamps .....	69
Fuel & Fuel Filters .....	73
Metal Parts.....	75
Oil.....	77
Oil Filters.....	85
Refrigerants/Motor Vehicle Air Conditioning (MVAC) Service .....	89
Solvents - Introduction .....	95
Aqueous-Based.....	97
Petroleum-Based .....	101
Sorbents .....	105
Tires.....	109
Wastewater From Service Bay Drains .....	111
Wipes .....	117

### **SHOP WORK AREA & EQUIPMENT**

General Work Area .....	121
General Machinery and Tool Requirements.....	123
Grinding (Abrasive Wheel Machinery).....	125
Tow Trucks and Other Shop Vehicles .....	129
Welding, Cutting & Brazing/Oxygen & Acetylene Tanks.....	133

## **CHAPTER 5—EMERGENCY PLANS, TRAINING, RECORDKEEPING & REPORTING**

5.1 OSHA Hazard Communication Standard.....	141
5.2 Other OSHA Plans.....	142
OSHA Medical Service Requirements .....	143
5.3 RCRA Emergency Plan .....	143
5.4 Recordkeeping .....	144
5.5 Reporting .....	148
5.6 Employee Training (General) .....	149
5.7 Fire Prevention Training.....	150

## **BLUE TAB**

<b>ACRONYMS</b> .....	155
<b>GLOSSARY</b> .....	157
<b>INDEX</b> .....	161

## **GRAY TAB**

### **ATTACHMENTS**

#### **OSHA Sample Plans**

OSHA Supplementary Record of Occupational Injuries and Illnesses (OSHA 101 Log) .....	A
Emergency Action Plan.....	B
Hazard Communication Program.....	C
Lockout/Tagout Program .....	D
Personal Protective Equipment Guide.....	E
OSHA Log and Summary of Occupational Injuries and Illnesses (OSHA 200 Log) .....	F

#### **Sample Forms, Letters, and Stickers**

Material Safety Data Sheet (MSDS) .....	H
Form Letter for Obtaining a Material Safety Data Sheet (MSDS).....	I
Chemical Inventory List.....	J
Emergency Notification.....	K
Employee Training Record.....	L
Motor Vehicle Air Conditioning (MVAC) - EPA Owner Certification Form.....	M
Uniform Hazardous Waste Manifest - Completed.....	N
Uniform Hazardous Waste Manifest - Blank.....	O
Non-Hazardous Waste Manifest - Completed .....	P
Sample Shipping Labels and Hazardous Waste Sticker.....	Q
Task Responsibility Worksheet.....	R
Reclassification Letter (SQG to CESQG).....	S